

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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FINNEGAN LANE ASSOCIATES LLC,

Plaintiff,

v.

Civil Action No.:

ALLIANZ GLOBAL RISKS U.S.
INSURANCE COMPANY,
CONTINENTAL CASUALTY
COMPANY, LEXINGTON INSURANCE
COMPANY, LLOYD'S SYNDICATE
1919, STEADFAST INSURANCE
COMPANY,

NOTICE OF REMOVAL

Defendants.

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TO THE CLERK OF THE ABOVE ENTITLED COURT

PLEASE TAKE NOTICE that on this date, defendants ALLIANZ GLOBAL RISKS U.S.
INSURANCE COMPANY, CONTINENTAL CASUALTY COMPANY, LEXINGTON
INSURANCE COMPANY, LLOYD'S SYNDICATE 1919, STEADFAST INSURANCE
COMPANY, referred herein as the Insurers, by their attorneys, WHITE, FLEISCHNER &
FINO, LLP, respectfully shows this Court:

1. This action was commenced by the filing of a Complaint in the Passaic County
Superior Court of New Jersey, on or about July 27, 2012. Annexed hereto as **Exhibit "A"** is a
copy of this pleading.

2. Defendants received the Summons and Complaint on August 14, 2012. Thus,
removal is timely as provided by 28 U.S.C. §1446 (b).

3. Plaintiff in the above captioned matter claims defendants breached the policy of
insurance contract, when they declined to pay compensation for a claim alleged to have arisen
out of a snowstorm on February 11th and 12th, 2010.

4. Plaintiff alleges it sustained property damage due to the snowstorm and that defendants violated the property insurance policy by not paying compensation.

5. Based upon information and belief, including, *inter alia*, review of the damages alleged, Plaintiff seeks damages in excess of \$75,000, exclusive of interests and costs, in this matter.

6. This Court has original jurisdiction of this civil action pursuant to 28 USC §1332 because there is complete diversity in the matter and the amount in controversy exceeds the sum of \$75,000 exclusive of interest and costs.

7. Defendant ALLIANZ GLOBAL RISKS U.S. INSURANCE COMPANY is a California corporation with a principal place of business in Illinois.

8. Defendant CONTINENTAL CASUALTY COMPANY is a Pennsylvania Corporation with its principal place of business in Illinois.

9. Defendant LEXINGTON INSURANCE COMPANY is a Delaware Corporation with its principal place of business in Massachusetts.

10. Defendant LLOYD'S SYNDICATE 1919 is an insurance syndicate doing business at Lloyd's, London whose member is Starr Syndicate Limited, domiciled in England with its principle place of business in London, England.

11. Defendant STEADFAST INSURANCE COMPANY is a Delaware Corporation with its principal place of business in Illinois.

12. Plaintiff is a resident of New Jersey.

13. There are no parties to this action which can be ascertained at this time who are believed to reside in New Jersey, other than plaintiff.

PLEASE TAKE FURTHER NOTICE that Defendants, upon filing the Notice of Removal in the Office of the Clerk of the United States District Court for the District of New Jersey, has also filed copies of the Notice with the Clerk of the Superior Court of New Jersey, Law Division, Passaic County at 77 Hamilton Street, Paterson, NJ 07505, to effect removal of this action to the United States District Court pursuant to 28 U.S.C. Section 1446(d).

Dated: August 24, 2012

WHITE FLEISCHNER & FINO, LLP



Benjamin A. Fleischner

Jared T. Greisman

Attorneys for Defendants: ALLIANZ GLOBAL
RISKS U.S. INSURANCE COMPANY,
CONTINENTAL CASUALTY COMPANY,
LEXINGTON INSURANCE COMPANY,
LLOYD'S SYNDICATE 1919, STEADFAST
INSURANCE COMPANY

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